



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: OCE-084, Suite 900

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. William Ernst
Company Energy & Environmental Affairs
The Boeing Company
P.O. Box 3707 (MC 1W-12)
Seattle, Washington 98124-2207

**Re: REQUEST FOR INFORMATION: North Boeing Field-Improper Disposal of PCBs
(40 CFR Part 761)**

Dear Mr. Ernst:

This letter concerns the information available to EPA which indicates that on several occasions from 2004 through 2008, the Boeing Company improperly disposed of with polychlorinated bi-phenyls (PCBs) at a concentration of greater than or equal to 0.5 µg/L (approximately 0.5 ppb) and greater than 50 parts per million (ppm). The PCB regulations at 40 CFR § 761.79(a) allow for unrestricted discharge of PCBs into navigable waters at less than or equal to 0.5 µg/L. In addition the PCB regulations at 40 CFR 761.60 requires the disposal of PCBs at greater than or equal to 50 ppm. All PCBs that are not contained and intact and non-leaking are considered improper disposal.

The PCB regulations further require such PCB-contamination at as found levels be remediated in a low occupancy area to 25 parts per million as required under 40 CFR § 761.61(a). The PCB regulations also require that PCBs discharged to navigable waters be permitted under a CWA permit at 40 CFR § 761.79(a).

The EPA requests that the Boeing Company provide copy of the analytical records and documents for the contaminated PCB waste in the North Boeing Field, and the analyses that were completed for the PCB contamination that were improperly disposed of at NBF or improperly disposed of into the Duwamish River from NBF. The EPA also requests copies of all PCB Spill Reports for this same period including any SPCC reports. The EPA also requests copies of all documents regarding the sixteen oil/water separators that are located on North Boeing Field and the analytical information concerning the PCB content in the oil as well as the PCB content remaining in the separated oil and water.

For the same location the EPA also requests that you provide facility records for PCB containing electrical equipment, all PCB bulk product waste (e.g. caulk, paint, cable etc.) and hydraulic fluids that may contain PCBs. This information request also requests the records of the PCB-contaminated water/waste that was vacuumed from the drain systems/lines at North Boeing Field (NBF) including the PCB analytical data, manifests, and certificates of destruction/disposal required under 40 CFR §§ 761.60 and 208.

Please provide the requested documents and information to Mr. Daniel Duncan at the address below within 30 days of receipt of this letter:

**Mr. Daniel Duncan
U.S. EPA Region 10
Office of Compliance and Enforcement
Pesticides and Toxics Unit, OCE-084
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140.**

Please contact Daniel Duncan, Regional PCB Program Coordinator, at (206) 553-6693 or duncan.daniel@epa.gov, or Richard Mednick, Associate Regional Counsel, Office of Regional Counsel, at (206) 553-1797 or mednick.richard@epa.gov if you have any questions regarding this letter.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

cc: Mr. Mark Edens, WDOE
Mr. Steven Shestag – Director, EHS Remediation

Please contact Daniel Duncan, Regional PCB Program Coordinator, at (206) 553-6693 or duncan.daniel@epa.gov, or Richard Mednick, Associate Regional Counsel, Office of Regional Counsel, at (206) 553-1797 or mednick.richard@epa.gov, if you have any questions regarding this letter.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

cc: Mr. Mark Edens, WDOE, Project Manager
Mr. Robert Warren, WDOE, Regional Section Manager
Mr. Steven Shestag, Director EHS Remediation

Mr. Mark Edens, Project Manager
Washington Department of Ecology
Northwest Regional Office
Toxics Cleanup Program
3190 – 160th Avenue, S.E.
Bellevue, Washington 98008-5452

Mr. Steven Shestag
EHS Remediation Director
The Boeing Company
P.O. Box 3707, M/C 055-T487
Seattle, Washington 98124-2207

Mr. Robert Warren, P.Hg., MBA
Regional Section Manager
Toxics Cleanup Program
Northwest Regional Office
3190 – 160th Avenue, S.E.
Bellevue, Washington 98008-5452

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CONCURRENCES			
Initials:			
Name:	Dan Duncan	Richard Mednick (ORC)	

Date:			
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bcc: Christie Brown, Corrective Action & Permits Team (AWT-121)